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## **Vedrørende: Høring over udkast til bekendtgørelse om trawlfri zone i Bælthavet, sagsnummer 2021-7617.**

Danmarks Sportsfiskerforbund vil gerne indlede med en ubetinget ros til de ansvarlige politikere for deres mod til at etablere en trawlfri zone i Bælthavet.

Anledningen er meget trist – miljøtilstanden befinder sig på et historisk lavpunkt. For at rette op på det, er der brug for ekstraordinære initiativer, og det kan man roligt kalde etablering af en trawlfri zone.

Det fremragende initiativ kan dog ikke stå alene, idet en meget stor del af problemet består i årtiers udledning af næringssalte. Så sammen med den trawlfri zone bør der så hurtigt som muligt gennemføres de begrænsninger i udledningerne af næringssalte, som eksperterne har beregnet sig frem til, er nødvendige for at vende den sørgelige udvikling.

I bilag 1 ses en opsummering af effekten af brugen af bundtrawl. Teksten er fra rapporten ”The decline of cod in the Baltic Sea”<sup>1</sup>. Selv om de fleste af referencerne ikke er fra Østersøen, så er der efter vores vurdering klar evidens for, at et stop for brugen af trawlredskaber vil kunne blive et stort plus for det marine havmiljø. Erfaringer fra Øresund, hvor der har været et trawlforbud siden 1932, samt fra udlandet viser tydeligt, at det gør en forskel at friholde områder for trawlfiskeri.

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<sup>1</sup> Birgersson et al, 2022. <https://www.fishsec.org/app/uploads/2022/04/FishSec-Report-Divine-Baltic-Cod-March2022.pdf>



Ud over de miljømæssige fordele, som er beskrevet i sagsfremstillingen og i bilag 1 i dette høringssvar, så vil et trawlforbud – kombineret med den nødvendige begrænsning i udledninger af næringsalte – sandsynligvis medføre, at andre og mere skånsomme fiskeriformer samt det rekreative fiskeri vil kunne få bedre vilkår.

Alternativet – at fortsætte som hidtil – ville kunne medføre, at et fremtidigt skånsomt erhvervsfiskeri aldrig vil blive aktuelt, fordi hele økosystemet er kollapsede.

Vi opfordrer derfor til som minimum ikke at reducere i udpegningen af det område, hvor der ikke skal kunne fiskes med trawl.

Vi ønsker desuden, at den danske del af Flensborg Fjord skal indgå i det trawlfrie område. Dels fordi området er meget hårdt presset, og så fordi tyskerne ikke trawler i deres del af fjorden. Ved at imødekomme et tysk ønske om stop for trawl i den danske del af fjorden – og det ønske findes – kan man forhåbentligt skabe et bedre grundlag for fremtidige forhandlinger med Tyskland om forvaltningen om Østersøen.

Vi opfordrer til, at udpegningen af det trawlfrie område vil blive fulgt op af et overvågningsprogram, sådan at udviklingen kan følges. Gode – og dårlige – erfaringer kan så indgå som grundlag for beslutninger om den fremtidige forvaltning af de indre danske farvande.

Med venlig hilsen

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## Bilag 1 – Effekten af brugen af bundtrawl

### 1.5.1.4. Bottom trawling -

Bottom trawling can be done with heavy nets and gear which are dragged along the seabed behind the fishing vessel. This efficiently catches large numbers of organisms but also disturbs non-target species and the seabed itself by “ploughing” the sea floor, making it flatter and less complex (Puig et al., 2012). Bottom trawling has been linked to decreased diversity and lower abundance of benthic invertebrates, limiting or changing the food availability for fish (Hiddink et al., 2016), as well as reducing the amounts of the fish themselves. Non-target species are frequently caught or relocated. Additionally, the interaction between the gear and the seabed resuspends the sediment into the water, leading to increased turbidity and relocation of the sediment. This can negatively impact eggs and larvae, which are less mobile than adults and depend on specific areas to grow up in (Sköld et al., 2018). However, few studies of the effects of bottom trawling on fish in the Baltic Sea have been done so far.

As mentioned previously, nursery habitats of the Eastern Baltic cod are found in deep areas where salinity is higher and are limited by the oxygen deficiency in the Baltic Sea. Bottom trawling can interfere with the nursery areas and could negatively impact the cod population if fewer larvae are allowed to grow into adulthood.

A recent report on the state of Swedish cod suggested that an important measure for recovery of the EBC stock would be to protect nursery habitats in specific areas from trawling (Bryhn et al., 2020). The fact that Öresund cod does not have a truncated size structure and is seemingly healthier than the rest of the WBC stock and the EBC stock might indicate that the lack of trawling is positive for cod stock. As mentioned in Section 1.4.4, a local trawling ban has been in place in the area since the 1930s (Anonymous, 1932; Svedäng & Hornborg, 2017).

Bottom trawling also adds to the already severe environmental status of the Baltic sea when it comes to eutrophication. Bottom trawling is the greatest source of disturbance to the seabed on a global basis, and it is critically coupled with eutrophication (Ferguson et al., 2020). In short, bottom trawling disturbs the denitrification process which buffers against eutrophication, i.e. areas where bottom trawling occurs have lower resilience to eutrophication (Ferguson et al., 2020). As the Baltic Sea suffers from heavy eutrophication, adversely affecting cod, bottom trawling adds to both the disturbance of cod nursery habitats and also lowers resilience to nutrient enrichment in the system, so that there is a double negative effect on cod. Furthermore, bottom trawling affects the carbon cycle and disturbs carbon sinks when the



demersal trawls creates resuspension of the sediment, hence counteracting the sinking carbon (Cavan and Hill, 2020), and also adds to ocean acidification and potentially atmospheric CO<sub>2</sub> (Sala et al., 2021). Marine sediment can store organic carbon for a very long time if left undisturbed, and the protection of carbon-rich seabeds has thus been suggested as one way to combat climate change (Sala et al., 2021). A recent special request from ICES has led to the analysis of different management scenarios to reduce seafloor disturbance by bottom trawling. It is shown that a 10% reduction in bottom trawling efforts from peripheral fishing grounds will induce a 40% increase of untrawled areas, collectively in the Baltic Sea, the Greater North Sea, the Celtic Seas, and the Bay of Biscay and the Iberian Coast (ICES, 2021c).